



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, New York 10007

May 7, 2025

Conference Adjourned

From: May 9, 2025
To: June 25, 2025 at 2:00pm

SO ORDERED:


P. KEVIN CASTEL, U.S.D.J.

Date: 5 - 8 - 2025

VIA ECF

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Saifa Mohamed Kassim v. Noem, et al.*, No. 25 Civ. 1645 (PKC)

In person, Courtroom 11D

Dear Judge Castel:

This Office represents the defendants (the “government”) in this mandamus action, in which the plaintiff seeks an order directing U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate an allegedly unduly delayed Petition for Alien Relative (“Form I-130”). This action was filed on February 26, 2025, and based on the date of service on this Office, the government’s response to the complaint is due on May 26, 2025.

On February 27, 2025, Your Honor entered an Initial Pretrial Conference Order scheduling the Initial Pretrial Conference for May 9, 2025, and directing the parties to submit a joint letter by May 2, 2025, five business days before the conference. *See* ECF No. 9. Counsel for the Plaintiff and for the government both inadvertently neglected to calendar the conference and the deadline for the submission of the joint letter. The parties apologize to the Court for the oversight.

With respect to the merits of the case, the parties hope to resolve this matter consensually prior to the due date for the government’s response to the complaint. Therefore, the parties respectfully request adjournment of the Initial Pretrial Conference and required submissions *sine die*. Should the parties be unable to resolve this matter without litigation, the government will file a motion to dismiss. This is the parties’ first request for adjournment of the conference and the deadline for the joint letter.

I thank the Court for its consideration of this request.

Respectfully submitted,

JAY CLAYTON
United States Attorney

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cc: Counsel of record (via ECF)